

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

(1) KIMBERLY POFF,

Plaintiff,

v.

Case No. 5:14-cv-01438-C

(1) STATE OF OKLAHOMA *ex rel* THE
OKLAHOMA DEPARTMENT OF
MENTAL HEALTH AND
SUBSTANCE ABUSE SERVICES;
(2) THE BOARD OF DIRECTORS FOR
THE OKLAHOMA DEPARTMENT
OF MENTAL HEALTH AND
SUBSTANCE ABUSE SERVICES,
et al

Defendants.

**SUPPLEMENT TO THE WITNESS AND EXHIBIT LISTS OF DEFENDANTS
STATE OF OKLAHOMA EX REL. THE OKLAHOMA DEPARTMENT OF
MENTAL HEALTH AND SUBSTANCE ABUSE SERVICES AND THE BOARD
OF DIRECTORS FOR THE OKLAHOMA DEPARTMENT OF MENTAL
HEALTH AND SUBSTANCE ABUSE SERVICES**

Defendants, State of Oklahoma *ex rel* The Oklahoma Department of Mental Health and Substance Abuse Services and The Board of Directors for the Oklahoma Department of Mental Health and Substance Abuse Services (“Defendants”) submit their Supplement to the Witness and Exhibit Lists filed on March 29, 2016 as follows. These documents were referred to in the deposition of Plaintiff, and/or produced in a binder to Plaintiff at the deposition.

EXHIBIT LIST

<u>No.</u>	<u>Description</u>	<u>Identification/Bates Label</u>	<u>Expectation</u>
37.	8-26-13 letter written by R. Bussett re Termination of Kimberly Poff, 8/23/13	Poff v. ODMHSAS 000001-000006	May Use
38.	ODMHSAS Investigative Process Video	ODMH 001542	May Use
39.	All documents and exhibits in the binder of exhibits that were produced to Plaintiff at Plaintiff's deposition in December 2015	Binder Produced at Plaintiff's Deposition	May Use

Discovery is still ongoing in this case; as a result, Defendants reserve the right to amend its Final Witness and Exhibit Lists to the extent additional witnesses and/or documents are identified through the course of further discovery.

Respectfully submitted,

/s/ Victor F. Albert

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Board of Directors for The Oklahoma
Department of Mental Health and Substance
Abuse Services***

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of April 2016, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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